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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

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14 IN RE: JUUL LABS, INC., MARKETING,
15 SALES PRACTICES, AND PRODUCTS
16 LIABILITY LITIGATION

17 This Document Relates to:

18 CLASS ACTIONS

19 Case No. 19-md-2913-WHO

20 **JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
DEADLINE FOR SUBMITTING
PROPOSED REDACTIONS FOR CLASS
CERTIFICATION OPPOSITION
PAPERS**

21 Hon. William H. Orrick

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JOINT STIPULATION AND [PROPOSED] ORDER REGARDING DEADLINE FOR SUBMITTING
PROPOSED REDACTIONS FOR CLASS CERTIFICATION OPPOSITION PAPERS
Case No. 19-md-2913-WHO

1 WHEREAS, on August 27, 2021, the Court granted (with modification) the parties'
2 stipulation that, among other things, requested that materials related to Defendants' class
3 certification oppositions be conditionally filed under seal. ECF 2306. The Court directed the
4 parties to file proposed redactions within 20 days of filing Defendants' class certification
5 oppositions;

6 WHEREAS the parties have been diligently reviewing the materials submitted in
7 connection with Defendants' class certification oppositions and identifying materials they
8 would request remain under seal;

9 WHEREAS JLI, Altria, and the Other Director Defendants each filed a brief and
10 exhibits in opposition to class certification. Each opposition included as exhibits, among other
11 things, deposition transcripts from plaintiffs in the litigation;

12 WHEREAS, given the volume of material submitted in opposition to class certification,
13 Plaintiffs respectfully request, and Defendants do not oppose, a modest extension to the
14 September 16 deadline for submitting a joint chart that identifies the materials that the parties
15 wish to remain under seal.

16 **NOW THEREFORE**, the parties, through their undersigned counsel, hereby stipulate,
17 agree and respectfully request that the Court enter an Order the parties shall file the joint chart
18 identifying the materials that they request remain under seal no later than September 20, 2021.
19 All other provisions of the Court's August 27 order remain in effect.

20
21 Dated: September 16, 2021

Respectfully submitted,

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12 **FILER'S ATTESTATION**

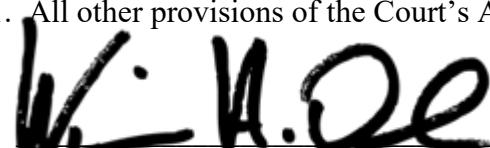
13 I, Dena C. Sharp, am the ECF User whose ID and password are being used to file this
14 document. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have
15 concurred in this filing.

16 /s/ Dena C. Sharp

17 **[PROPOSED] ORDER**

18 **PURSUANT TO STIPULATION AND GOOD CAUSE SHOWING, IT IS HEREBY**
19 **ORDERED:** the parties shall file the joint chart identifying the materials that they request
20 remain under seal no later than September 20, 2021. All other provisions of the Court's August
21 27 order remain in effect.

22 Dated: September 16, 2021

23 
24 HONORABLE WILLIAM H. ORRICK
25 United States District Judge